



21st Floor
1251 Avenue of the Americas
New York, NY 10020-1104

Sharon L. Schneier
212.603.6448 tel
212.379.5248 fax

sharonschneier@dwt.com

April 10, 2023

VIA ECF

The Honorable Sarah Netburn
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Stansell v. FARC*, Case No. 1:16-mc-405-LGS-SN;
Pescatore v. Pineda, Case No. 1:18-545-LGS-SN (Related Case)

Dear Judge Netburn:

We represent Citibank, N.A. (“Citibank”) with respect to the turnover motion relating to Banco de Venezuela. As directed by the Court on February 8, 2023, we are writing to provide an update regarding Citibank’s efforts to serve Banco de Venezuela. *See* Dkt. No. 516.

On November 10, 2022, Citibank filed a motion for leave to seek alternative means of service on Banco de Venezuela. Dkt. No. 478. As set forth therein, Citibank has made diligent efforts to effectuate service on Banco de Venezuela via the Hague Convention. To date, the Venezuelan Central Authority has not accepted delivery of Citibank’s service documents. *Id.* at 6-7. Citibank’s motion also identified the steps it took to seek service waivers from the law firms it understood may represent Banco de Venezuela, including Marcos D. Jiménez P.A., which has appeared for Banco de Venezuela. *See id.* at 2; Dkt. No. 361 at n.1. None of these firms were or are authorized to accept service for Banco de Venezuela. Accordingly, in order to effectuate service on Banco de Venezuela Citibank respectfully requests that the Court grant its motion for alternative service.

Respectfully submitted,

Davis Wright Tremaine LLP

/s/ Sharon L. Schneier

Sharon L. Schneier